

July 9, 2013

Mr. Jim McAdoo  
Tennessee Department of Environment and Conservation  
Division of Water Resources  
Permit Section  
6<sup>th</sup> Floor L & C Annex  
401 Church Street  
Nashville, TN 37243-1534

**RE:     Underground Storage Tank (UST) Remediation – NPDES Permit Renewal**  
**Permit Number TNG830000**  
**Permit Tracking Number: TNG830129**  
**Former BP Service Station - BP Site No. 24368**  
**222 Shelby Avenue**  
**Nashville, Tennessee**  
**TDEC Facility ID No. 95-190964**  
**Antea Group Project No. TN24368131**

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Dear Mr. McAdoo:

Antea™Group submits this request on to the Tennessee Department of Environment and Conservation (TDEC), Division of Water Resources, regarding the referenced site permitted under the General NPDES Permit for Discharges of Treated Groundwater Associated with Underground Storage Tank Remediation (RMCP), Permit Number TNG830000 having a Permit Tracking Number of TNG830129, for the UST Remediation TDEC Facility ID. No. 95-190964.

Antea™Group completed the approved remediation work for the Former BP Service Station – BP Site No. 24368 as directed by the TDEC- UST Division and will not discharge treated wastewater from this site in the future.

The TDEC UST Division issued a “Termination of Corrective Action/ Closure Monitoring” letter to BP Products North America Inc. (BP) on December 16, 2011 stating that no additional corrective action should be conducted at the referenced site (**Attachment I**). The groundwater remediation system or Corrective Action System (CAS) was placed offline and deactivated in January 2012. There were no treated groundwater discharges after the CAS was deactivated.

The TDEC UST January 18, 2013 correspondence directed BP to properly abandon all monitoring and recovery wells associated with the site and to properly decommission the CAS (**Attachment II**).

A soil sampling event and four groundwater monitoring events were performed from January 2012 through December 2012. The last NPDES Discharge Monitoring Report was submitted to the Division of Water Resources on January 31, 2013 (**Attachment III**) which indicated no discharges occurred after the CAS was deactivated.


The Monitoring Well Abandonment and Corrective Action System Decommissioning Report was submitted to TDEC-UST on April 4, 2013. A copy of the letter report without attachments is presented in **Attachment IV**.

Antea™Group understands that the General NPDES Permit for Discharges of Treated Groundwater Associated with UST Remediation (RMCP), Permit Number TNG830000, was reissued on June 1, 2013 and effective on July 1, 2013.

We do not plan to submit a Notice of Intent (NOI) to renew our NPDES permit (Permit Number TNG830000 having a Permit Tracking Number of TNG830129) because we will not discharge any treated wastewater from this source in the future. We request that you review the attached information and close the administrative file for this NPDES permit associated with the referenced site.

Our office is moving to a new location at 4940 Peachtree Industrial Blvd., Suite 350, Norcross, Georgia 30071. If you have any questions or comments, please do not hesitate to contact me at (404) 542-2298.

Sincerely,

  
Kenneth L. Brooke, P.E.

Project Manager

[ken.brooke@anteagroup.com](mailto:ken.brooke@anteagroup.com)

Antea Group

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Attachments

cc: Antea Group Project File  
Carla Nascimento, Jimmy Wong and Michelle Dukes (Antea Group)

**ATTACHMENT I**

**TDEC UST TERMINATION OF CORRECTIVE ACTION**

**AND**

**CLOSURE MONITORING LETTER**

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**NASHVILLE ENVIRONMENTAL FIELD OFFICE  
TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION**

711 R.S. Gass Blvd  
Nashville, TENNESSEE 37243  
(615) 687-7000 STATEWIDE 1-888-891-8332 FAX (615) 687-7078

December 16, 2011

Ms. Janet J. Wager  
BP Products North America, Inc.  
201 Helios Way, Sixth Floor  
Houston, TX 77079

RE: **Termination of Corrective Action / Closure Monitoring**  
BP Site #24368  
222 Shelby Avenue, Nashville, Tennessee  
Facility ID # 5-190964, Davidson County

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Dear Ms. Wager:

The Division of Underground Storage Tanks (Division) has reviewed the Corrective Action Monitoring Report dated December 5, 2011. Groundwater analytical data indicate the Chemicals of Concern (COCs) concentrations are below the approved site-specific standards and free product is no longer detected. Therefore, the Division requires that BP Products North America, Inc. deactivate the Corrective Action System (CAS) in accordance with the enclosed System Deactivation Checklist. **No additional corrective action shall be conducted, unless directed otherwise by the Division.** The CAS shall be placed offline by January 6, 2012 and shall be maintained and ready for operation. The Deactivation Checklist shall be completed and submitted with the first Corrective Action Closure Monitoring Report (CACMR).

Corrective Action (CA) Closure Monitoring shall be conducted and reported in accordance with the Approved CAP and the current CAP Guidelines and as directed below by the Division. All monitoring and recovery wells shall be sampled during the first and fourth CA closure monitoring events. Monitoring well MW-2 and MW-13 and recovery well RW-3 shall be sampled during the second and third CA closure monitoring events.

Soil sampling shall be conducted during the first CA closure monitoring event in the vicinity of where soil concentrations historically exceeded the approved Site Specific Cleanup Levels (SSCLs). Soil sampling shall be conducted in the vicinity of MW-2 from (19' to 21') below ground surface (bgs) and in the vicinity of MW-3 from (14' to 16') bgs. Soil samples shall not be collected from the saturation zone. If groundwater is encountered before the aforementioned intervals, soil samples shall be collected from immediately above the groundwater interface. All soil and groundwater samples shall be analyzed for the COCs listed in the site-specific standard.

**In accordance with rule 1200-01-15-.06(1), this office must be notified at least one working day in advance of any field activities.**

CACMRs shall be submitted as follows:

Report	Submittal Date
CACMR	April 16, 2012
CACMR	July 16, 2012
CACMR	October 16, 2012
CACMR	January 16, 2013

Submit an original of all correspondence and reports to this field office and a copy to:

Division of Underground Storage Tanks  
Tennessee Department of Environment and Conservation  
4th Floor, L & C Tower  
401 Church Street  
Nashville, TN 37243-1541

All forms and guidance are available at [www.tn.gov/environment/ust](http://www.tn.gov/environment/ust).

If you have any questions concerning this correspondence, call (615) 687-7095.

Sincerely,



Drew Storm, P.G.  
Environmental Specialist  
Division of Underground Storage Tanks

Enclosure: System Deactivation Checklist

c: Ms. Carla Nascimento - Antea Group  
Mr. Kenneth Brooke - Antea Group  
Ms. Michelle Dukes - Antea Group  
Mr. Walter Overton - Cumberland Stadium, Inc.  
Mr. Dempsey Henderson - Cumberland Stadium, Inc.  
Mr. Emmett Edwards - Nashville Sports Authority  
UST Central Office - Technical File  
Nashville UST Field Office Case File #5-190964

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# Corrective Action System Deactivation Checklist

Page 1

Facility ID #:	CAP approval date:		
Facility name:	CAS TDEC Tag ID#:		
Facility address:	CAS manufacturer ID #:		
	CAS activation date:		
Facility (CAS) telephone #:			
CAC completing checklist:	CAS deactivation date(s):		
Person(s) completing checklist:	Time onsite:	Time offsite:	
<b>CAS Deactivation Tasks:</b>			
Receive closure monitoring (deactivation) letter from Division	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Dewater CAS inlet manifold	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Close valves at CAS inlet manifold	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Dewater influent piping to AWS-1 inlet (ensure strainer/screen secured in CAS, if available)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Clean and dewater AWS-1 stilling well and probes	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Clean (e.g., remove sediments from) and dewater AWS-1 tank	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Drain water from liquid ring pump and process piping and heat exchanger (if water-sealed system)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Winterization of liquid ring pump and heat exchanger (if water-sealed system)			
in accordance with manufacturer's recommendations	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Open air-relief valve (for air-assist compressor)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Close all air lines (for air-assist compressor)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Dewater all water treatment process piping and hosing	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Close all water treatment process piping valves	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Close all transfer pump valves and sample ports	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Clean and dewater inlet air particulate filter housing	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Clean oil strainer (if not conducted within last quarter)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Close oil seal ball valve	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Backwash carbon vessel(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Drain excess water from carbon vessel(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Open vents and/or valves at carbon vessel(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Remove fouled bag filter(s) and properly dispose	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Clean and dewater bag filter vessel(s) (do not replace with new bag filters)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Clean and dewater Stripperator	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Clean aeration tubes	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Clean and dewater oil/water separator	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Clean coalescing packing	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Clean and dewater Stripperator effluent sump	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Clean Stripperator effluent sump probes	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Clean and flush flow meter	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Open AWS-1, Stripperator, bag filter vessels and effluent sump lids and covers (allow to air dry)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Close air flow dampers	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Close air flow shroud inside and outside (sound box)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Remove stack-pipe tops and place in CAS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Tape open roof stacks	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Place all breakers in control panel to off position	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Place all controls to off position	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Place main breaker to off position and lock	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Unplug phone line from telemetry (inside control panel)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A

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# Corrective Action System Deactivation Checklist

Page 2

Facility ID #:			
Facility name:			
<b>CAS Deactivation Tasks (cont.)</b>			
Remove drop tubes (stingers) from recovery wells, rollup and place in CAS (allow to air dry)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Remove air-assist tubing from recovery wells, rollup and place in CAS (allow to air dry)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Remove groundwater pumps, leads, hose and support line from recovery wells, rollup and place in CAS (allow to air dry)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Cap recovery wells and secure recovery well vaults	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Cap and secure monitoring wells	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Secure CAS door, corners and control panel door	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Number of drums onsite from O&M			
Number of drums generated during deactivation activities			
Total number of drums properly disposed of (attach manifest)			
Drain and properly dispose of contents of free product tank (if applicable)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Total volume of liquid removed from free product tank and disposed of (attach manifest)			
Disconnect piping from CAS to free product tank	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Cap ports at free product tank and leave vent(s) open	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
<b>Tasks to be conducted during closure monitoring events:</b>			
Re-energize CAS electricity, use on toggle switch to "bump" liquid-ring pump, transfer pumps and blower motor to ensure operational			
Check for vandalism - if observed - document and notify case manager			
Comments:			
<b>Issues that TDEC and CAS manufacturer should be aware during refurbishment:</b>			
e.g., MSP breaker tripped on a quarterly basis.			

Refer to Reimbursement Guidance Document (RGD) - 002 for allowable deactivation task costs.  
Submit deactivation checklist with first Corrective Action Closure Monitoring Report (CACMR).

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**ATTACHMENT II**

**MONITORING WELL ABANDONMENT**

**AND**

**CORRECTIVE ACTION SYSTEM DECOMMISSIONING LETTER**

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**ENVIRONMENTAL FIELD OFFICE  
TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION**

711 R.S.Gass Blvd  
Nashville, Tennessee 37243  
(615) 687-7000 STATEWIDE 1-888-891-8332 FAX (615) 687-7078

January 18, 2013

Ms. Janet J. Wager  
BP Products North America, Inc.  
201 Helios Way, Sixth Floor  
Houston, TX 77079

Re: Monitoring Well Abandonment and Corrective Action System Decommissioning  
BP Site #24368  
222 Shelby Avenue, Nashville, Tennessee  
Facility ID # 5-190964, Davidson County

Dear Ms. Wager:

The Division of Underground Storage Tanks (Division) has reviewed the January 15, 2013 Corrective Action Closure Monitoring Report for the referenced facility. Additional monitoring and/or corrective action are not required.

BP Products North America, Inc. is required to properly abandon all monitoring and recovery wells in accordance with Section II.M. of the 2006 Environmental Assessment Guidelines. The corrective action system (CAS) shall be properly decommissioned using the enclosed CAS Decommission Checklist. Before this case can be closed, a monitoring well abandonment report, listing the wells abandoned and the driller license number and CAS Decommission Checklist shall be submitted to this field office by March 6, 2013.

Please notify the Division one working day prior to abandoning the monitoring wells in accordance with Rule 0400-18-01-.06(1).

All forms and guidance are available at [www.tn.gov/environment/ust](http://www.tn.gov/environment/ust)

If you have any questions concerning this correspondence, please do not hesitate to contact me at (615) 687-7095.

Sincerely,

Drew Storm, P.G.  
Environmental Specialist  
Division of Underground Storage Tanks

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# Corrective Action System Decommission Checklist

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Facility ID #:	CAP approval date:		
Facility name:	CAS TDEC Tag ID#:		
Facility address:	CAS manufacturer ID #:		
	CAS activation date:		
Facility (CAS) telephone #:			
CAC completing checklist:	<b>CAS decommission date(s):</b>		
Person(s) completing checklist:	Time onsite:	Time offsite:	
<b>CAS Decommission Tasks:</b>			
Terminate electric account	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Remove electric meter	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Disconnect and remove electric line to CAS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Disassemble electrical riser and place in CAS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Remove temporary pole (if required)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Terminate water account/service (for water-sealed system)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Disconnect water line in accordance with local requirements (for water-sealed system)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Terminate telephone account/service	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Disconnect and remove telephone line to CAS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Terminate (water and/or air) discharge permit and/or account	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Disconnect and remove effluent piping from discharge point in accordance with local requirements	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Remove CAS inlet manifold and support	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Close and secure all open valves, vents, lids and covers inside CAS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Remove sound box and place in CAS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Secure excess oil containers, filters and other miscellaneous equipment inside CAS for transport	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Secure groundwater pumps in CAS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Dispose of unusable stingers and downhole hosing	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Monitoring and recovery wells abandoned	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
CAS removed from site	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Free product tank and/or additional equipment removed from site	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Remove CAS concrete pad	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Conduct site restoration	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Check for vandalism - if observed - document and notify case manager			
Comments:			
Issues that TDEC and CAS manufacturer should be aware during refurbishment:			
e.g., MSP breaker tripped on a quarterly basis.			

Refer to Reimbursement Guidance Document (RGD) - 002 for allowable decommission task costs.  
Submit decommission checklist with Monitoring Well Abandonment Report.

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**ENVIRONMENTAL FIELD OFFICE  
TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION**

711 R.S.Gass Blvd  
Nashville, Tennessee 37243  
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January 18, 2013

Ms. Janet J. Wager  
BP Products North America, Inc.  
201 Helios Way, Sixth Floor  
Houston, TX 77079

Re: Monitoring Well Abandonment and Corrective Action System Decommissioning  
BP Site #24368  
222 Shelby Avenue, Nashville, Tennessee  
Facility ID # 5-190964, Davidson County

Dear Ms. Wager:

The Division of Underground Storage Tanks (Division) has reviewed the January 15, 2013 Corrective Action Closure Monitoring Report for the referenced facility. Additional monitoring and/or corrective action are not required.

BP Products North America, Inc. is required to properly abandon all monitoring and recovery wells in accordance with Section II.M. of the 2006 Environmental Assessment Guidelines. The corrective action system (CAS) shall be properly decommissioned using the enclosed CAS Decommission Checklist. Before this case can be closed, a monitoring well abandonment report, listing the wells abandoned and the driller license number and CAS Decommission Checklist shall be submitted to this field office by March 6, 2013.

Please notify the Division one working day prior to abandoning the monitoring wells in accordance with Rule 0400-18-01-.06(1).

All forms and guidance are available at [www.tn.gov/environment/ust](http://www.tn.gov/environment/ust)

If you have any questions concerning this correspondence, please do not hesitate to contact me at (615) 687-7095.

Sincerely,

Drew Storm, P.G.  
Environmental Specialist  
Division of Underground Storage Tanks

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Ms. Janet J. Wager  
BP Products North America, Inc.  
Facility ID #5-190964  
January 18, 2013  
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c: Ms. Carla Nascimento - Antea Group  
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UST Central Office - Technical File  
Nashville UST Field Office Case File #5-190964

fo-011/dps/19096401.1813

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# Corrective Action System Decommission Checklist

Page 1

Facility ID #:	CAP approval date:		
Facility name:	CAS TDEC Tag ID#:		
Facility address:	CAS manufacturer ID #:		
	CAS activation date:		
Facility (CAS) telephone #:			
CAC completing checklist:	CAS decommission date(s):		
Person(s) completing checklist:	Time onsite:	Time offsite:	
<b>CAS Decommission Tasks:</b>			
Terminate electric account	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Remove electric meter	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Disconnect and remove electric line to CAS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Disassemble electrical riser and place in CAS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Remove temporary pole (if required)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
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Secure groundwater pumps in CAS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
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Conduct site restoration	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Check for vandalism - if observed - document and notify case manager			
Comments:			
Issues that TDEC and CAS manufacturer should be aware during refurbishment:			
e.g., MSP breaker tripped on a quarterly basis.			

Refer to Reimbursement Guidance Document (RGD) - 002 for allowable decommission task costs.  
Submit decommission checklist with Monitoring Well Abandonment Report.

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**ATTACHMENT III**

**NPDES DISCHARGE MONITORING REPORT – FOURTH QUARTER 2012**

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TN Division Of Water  
Pollution Control



Antea USA, Inc.  
5000 Peachtree Industrial Boulevard, Suite 160  
Norcross, Georgia 30097  
[www.anteagroup.com](http://www.anteagroup.com)

January 31, 2013

Mark Jordon  
Environmental Specialist  
Water Pollution Control Division  
Enforcement and Compliance Section  
Tennessee Department of Environment and Conservation  
6<sup>th</sup> Floor L&C Annex  
401 Church Street  
Nashville, Tennessee 37243

**RE: National Pollutant Discharge Elimination System Discharge Monitoring Report  
Fourth Quarter 2012  
Permit No. TNG830129, Discharge No. 001-G  
Former BP Service Station - BP Site No. 24368  
222 Shelby Avenue  
Nashville, Tennessee  
TDEC Facility ID. No. 5-190964  
Antea Group Project No. TN24368131**

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Dear Mr. Jordon:

Antea<sup>TM</sup>Group submits the attached National Pollutant Discharge Elimination System (NPDES) Discharge Monitoring Report (DMR) – Fourth Quarter 2012 for the referenced facility. This report details the data collected during the monitoring period of October 1, 2012 through December 21, 2012, and includes one set of associated analytical data for Permit Number TNG830129, Discharge No. 001-G (**Attachment I**). Antea Group is the current BP Products North America Inc. (BP) contractor for the Former BP Service Station 24368, located at 222 Shelby Avenue, Nashville, Tennessee, 37213.

In a correspondence dated December 16, 2011, the Tennessee Department of Environment and Conservation (TDEC) determined that the groundwater analytical data indicated that the Chemicals of Concern (COC) concentration(s) were below the approved Site Specific Cleanup Levels (SSCL) and directed Antea Group to deactivate the Corrective Action System (CAS) in accordance with the CAS Deactivation Checklist. On December 22, 2011, the CAS at the site was deactivated in accordance with the TDEC Deactivation Checklist and has remained inoperable during this reporting period.

In a correspondence dated January 18, 2013, TDEC determined that additional monitoring and/or corrective action are not required at the site, and directed Antea Group to properly abandon all monitoring and recovery wells and to decommission the CAS at the site. A copy of the January 18, 2013 TDEC directive is presented as **Attachment II** for your review.

CAS decommissioning and monitoring and recovery well abandonment activities are scheduled to be conducted on February 13 through 14, 2013. As such, this will be the last NPDES DMR that Antea Group will be submitting to the Water Pollution Control Division Enforcement and Compliance Section for this site.

If you have any questions regarding this submittal please contact me at (404) 391-4892 or Ken Brooke at (770) 825-1227.

Sincerely,



J. Michelle Dukes  
Project Professional  
[michelle.dukes@anteagroup.com](mailto:michelle.dukes@anteagroup.com)  
Antea Group

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Attachments: Analytical data for period of October 1, 2012 through December 21, 2012  
Copy of the January 18, 2013 TDEC directive

cc: Antea Group Project File (Norcross)



**ATTACHMENT I**  
**ANALYTICAL DATA TABLE**

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STREET AMERICA INC  
100  
188-6619  
STATION (BP 24368)

NATIONAL DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

TNG830129	001-G
PERMIT NUMBER	DISCHARGE NUMBER

DMR MAILING ZIP CODE: 37213

MINOR  
(SUBR 04)  
UST Remediation Treated Discharge  
External Outfall

MONITORING PERIOD						
YEAR	MO	DAY		YEAR	MO	DAY
12	10	01	TO	12	12	31

NO DISCHARGE ☒

	QUANTITY OR LOADING			QUALITY OR CONCENTRATION				No. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
	VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
SAMPLE EASUREMENT	*****	*****	*****	*****	NA	*****	SU	0	NA	NA
PERMIT EQUIREMENT	*****	*****	*****	6.5 DAILY MN	*****	9 DAILY MAX	SU	0	NA	NA
SAMPLE EASUREMENT	*****	*****	*****	*****	*****	NA	mg/L	0	NA	NA
PERMIT EQUIREMENT	*****	*****	*****	*****	*****	40 DAILY MX	mg/l	0	NA	NA
SAMPLE EASUREMENT	*****	*****	*****	*****	*****	NA	mg/L	0	NA	NA
PERMIT EQUIREMENT	*****	*****	*****	*****	*****	.164 Daily MX	mg/L	0	NA	NA
SAMPLE EASUREMENT	*****	*****	*****	*****	*****	NA	mg/L	0	NA	NA
PERMIT EQUIREMENT	*****	*****	*****	*****	*****	.01 DAILY MX	mg/L	0	NA	NA
SAMPLE EASUREMENT	*****	*****	*****	*****	*****	NA	mg/L	0	NA	NA
PERMIT EQUIREMENT	*****	*****	*****	*****	*****	.005 DAILY MX	mg/L	0	NA	NA
SAMPLE EASUREMENT	*****	*****	*****	*****	*****	NA	mg/L	0	NA	NA
PERMIT EQUIREMENT	*****	*****	*****	*****	*****	.01 DAILY MX	mg/l	0	NA	NA
SAMPLE EASUREMENT	NA	*****	NA	*****	*****	*****	*****	0	NA	NA
PERMIT EQUIREMENT	Req. Mon. VALUE	*****	Y=1; N=0	*****	*****	*****	*****	0	NA	NA
SAMPLE EASUREMENT	NA	*****	NA	*****	*****	*****	*****	0	NA	NA
PERMIT EQUIREMENT	Req. Mon. DAILY MX	*****	Mgal/d	*****	*****	*****	*****	0	NA	NA
SAMPLE EASUREMENT	*****	*****	*****	*****	*****	NA	mg/L	0	NA	NA
PERMIT EQUIREMENT	*****	*****	*****	*****	*****	.01 Daily MX	mg/L	0	NA	NA

OFFICER			TELEPHONE		DATE		
			AREA CODE	NUMBER	YEAR	MO	DAY
	I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted based on it.	Signature of Principal Executive Officer or Authorized Agent					

ANY VIOLATIONS (Reference all attachments here)

OTHER MONITORING REQUIREMENTS. PLEASE ATTACH AN ADDITIONAL PAGE FOR COMMENT AND EXPLANATION OF ANY VIOLATIONS, AS NECESSARY.

used.

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**ATTACHMENT II**  
**TDEC CORRESPONDENCE**

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**ATTACHMENT IV**

**COVER LETTER FOR THE**

**MONITORING WELL ABANDONMENT**

**AND**

**CORRECTIVE ACTION SYSTEM DECOMMISSIONING REPORT**

**(Letter Report without attachments)**

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Antea USA, Inc.  
5000 Peachtree Industrial Parkway, Suite 160  
Norcross, Georgia 30071 USA  
[www.anteagroup.com](http://www.anteagroup.com)

April 4, 2013

Mr. Drew Storm, P.G.  
Division of Underground Storage Tanks  
Tennessee Department of Environment and Conservation  
Nashville Environmental Field Office  
711 R.S. Gass Boulevard  
Nashville, Tennessee 37243

**RE: Monitoring Well Abandonment and Corrective Action System Decommissioning Report  
Former BP Service Station - BP Site No. 24368  
222 Shelby Avenue  
Nashville, Tennessee  
TDEC Facility ID. No. 5-190964  
Antea Group Project No. TN24368131**

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Dear Mr. Storm:

Antea™ Group is pleased to submit this Monitoring Well Abandonment and Corrective Action System Decommissioning Report to the Tennessee Department of Environment and Conservation (TDEC), Division of Underground Storage Tanks for Former BP Service Station No. 24368. The site is located at 222 Shelby Avenue in Nashville, Tennessee. A site map, **Figure 1**, depicting pertinent site features, is presented in **Attachment I**. In a correspondence dated January 18, 2013, TDEC required the proper abandonment of all monitoring wells and the decommissioning of the Corrective Action System (CAS) associated with the site. A copy of TDEC's January 18, 2013 correspondence, as well as an Extension Request letter (submitted to TDEC on March 5, 2013) are presented in **Attachment II**.

Antea Group contracted Tri-State Testing Services, Inc. (TN License Number 769) to abandon the wells at the site. From February 11 through 13, 2013, Antea Group field representatives supervised the proper abandonment of eight (8) existing wells (MW-1, MW-2, MW-4, MW-13, RW-1, RW-2, RW-3, and RW-4). Because the property owner re-asphalted the site, the sixteen (16) previously abandoned and destroyed wells (MW-3, MW-5, MW-6, MW-7, MW-7R, MW-8, MW-9, MW-10, MW-11, MW-12, MW-14, MW-14A, MW-15, MW-16, MW-17, and MW-18) could not be located during the well abandonment activities.

Monitoring well abandonment activities were completed at the site in accordance with Section II.M of the TDEC 2006 Environmental Assessment Guidelines. The depth of each well was gauged prior to abandonment, and the wells were pressure-grouted to the top of casing with a grout consisting of 95% Portland cement and 5% bentonite. The disturbed ground in the asphalt and concrete areas were restored with concrete to maintain the surface integrity. Photographs of the eight (8) abandoned wells are provided as **Attachment III**.


Antea Group contracted SEMS, Inc. (SEMS) to properly decommission and remove the CAS from the site. On February 22, 2013, SEMS field representatives decommissioned the CAS, in accordance to the CAS Checklist. A copy of the completed CAS Checklist is presented as **Attachment IV**.

On March 26, 2013, two soil waste drums and one sludge waste drum (generated during the deactivating and decontaminating of the site's CAS) were transported to Domermuth Environmental Services, located in Knoxville, Tennessee for offsite management and the wastes will be properly disposed of in the Waste Connections' - Scott Solid Waste Landfill in Oneida, Tennessee. A copy of the drum disposal Non-Hazardous Waste Manifest is presented in **Attachment V**.

The CAS pad will be removed, and final site restoration activities will be conducted, once TDEC has removed the CAS from the site.

If you have any questions regarding this submittal please contact me at (770) 825-1227 or Carla Nascimento at (908) 547-3834.

Sincerely,



Kenneth L. Brooke, P.E.

Project Manager

[ken.brooke@anteagroup.com](mailto:ken.brooke@anteagroup.com)

Antea Group

Cc: Antea Group Files (Norcross)

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Signature Pages

We, the undersigned, certify under penalty of law, including but not limited to penalties for perjury, that we will abide by the CAP Guidelines as established by Rule 1200-1-15-.06(10)(a) and the approved CAP, and that the information contained in this report including any attachments, is true, accurate and complete to the best of our knowledge, information, and belief. We further agree to submit all remediation information in accordance with the reporting formats as provided in the CAP Guidelines. Additionally, we agree to attend any meeting as scheduled and required by the Division. We are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for intentional misrepresentations.

Janet Wager *Janet Wager* 3/27/13  
Owner/Operator (Print name) Signature Date

BP Representative  
Title (Print)

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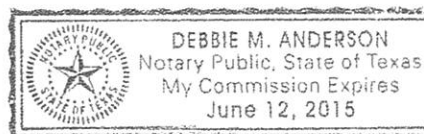
JUL 18 2013

TN Division Of Water  
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STATE OF Texas COUNTY OF Harris  
Sworn to and subscribed before me by Janet J. Wager on this date  
March 27, 2013. My commission expires June 12, 2015.

Debbie M. Anderson *Debbie M. Anderson* 3/27/2013  
Notary Public (Print name) Signature Date

Stamp/Seal

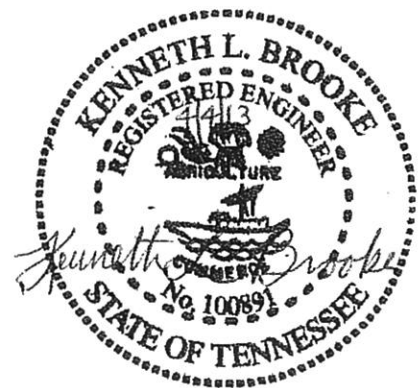


We, the undersigned, certify under penalty of law, including but not limited to penalties for perjury, that we will abide by the CAP Guidelines as established by Rule 1200-1-15-.06(10)(a) and the approved CAP, and that the information contained in this report including any attachments, is true, accurate and complete to the best of our knowledge, information, and belief. We further agree to submit all remediation information in accordance with the reporting formats as provided in the CAP Guidelines. Additionally, we agree to attend any meeting as scheduled and required by the Division. We are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for intentional misrepresentations.

Kenneth L. Brooke, P.E.  
P.E. or P.G. (Print name)

*Kenneth L Brooke* 4/4/13  
Signature Date

PE No. 100891  
Stamp/seal Tennessee Registration #



STATE OF Georgia COUNTY OF DEKALB  
Sworn to and subscribed before me by Kenneth L. Brooke on this date  
My commission expires 3/11/14.

*Karen Stephenson* *Karen Stephenson* 4/4/13  
Notary Public (Print name) Signature Date  
*KAREN STEPHENSON*

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